SOUTHERN DISTRICT OF NEW YORK	
IN RE: LOWER MANHATTAN DISASTER SITE LITIGATION	21 MC 102 (AKH)
This Document Relates to:	08cv02670
ROSA NAVAREZ,	
Plaintiff	

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT upon the Declaration of Christopher R. LoPalo dated December 30, 2011 and the exhibits annexed thereto, and pursuant to Fed. R. Civ. P. 60(b), Plaintiff's' Counsel will request this Court Order:

- 1. Plaintiff's case to be reinstated and;
- 2. Such other and additional relief as this Court deems just and proper.

Dated: New York, New York December 30, 2011

Respectfully submitted,

WORBY GRONER EDELMAN & NAPOLI BERN, LLP *Plaintiff's' Counsel*

Christopher R. LoPalo 350 5th Avenue, Suite 7413 New York, New York 10118 (212) 267-3700